

**UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF WISCONSIN**

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**In Re:**

**In Bankruptcy No:**

**ISRAEL McKINNEY and  
JENNIFER McKINNEY**

**Debtors.**

**Case No: 22-11588**

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**MOTION TO EXTEND TIME TO COMPLY WITH COURT ORDER (DOCKET #102)  
UP AND THROUGH UNTIL APRIL 23, 2023**

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Israel and Jennifer McKinney, Debtors by their attorneys, PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, hereby move the Court for an additional time (up and until April 23, 2023) to comply with the Court Order (Docket #102) to file an updated budget with the Court.

The Debtors have filed an amended plan and are process of surrendering their interest in the homestead property or potentially selling the property if it would make financial sense to do so. The Debtors currently live separately with a pending divorce occurring. The Debtors need additional time to estimate what those future expenses/living expenses are anticipated to be since the Debtor and dependents will be moving in the future.

Based on the foregoing, the Debtors are requesting up and until April 23, 2023 to have the plan payments current.

**Dated this 13th day of April, 2023 at La Crosse, Wisconsin.**

**PITTMAN & PITTMAN LAW OFFICES, LLC.**

**By: s/Greg P. Pittman  
Greg P. Pittman  
Attorney for Debtor  
Attorney No. 1073787  
712 Main Street  
La Crosse, WI 54601  
(608) 784-0841**